

ORIGINAL

FILED
Clerk
District Court

JAN 18 2006

For The Northern Mariana Islands
By _____
(Deputy Clerk)

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8 *Attorneys for the Defendant*

9
10 **IN THE UNITED STATES DISTRICT COURT**
11 **FOR THE NORTHERN MARIANA ISLANDS**

12 **EQUAL EMPLOYMENT OPPORTUNITY**
13 **COMMISSION,**

14 **Plaintiff,**

15 **vs.**

16 **KUMANOMI ISLAND COMPANY, LTD.,**

17 **Defendant.**

CIVIL ACTION NO. 05-0029

**DEFENDANT'S INITIAL
DISCLOSURES**

DATE: FEB 22 2006

TIME: 9:00 Am

Pursuant to Rule 26(a)(1), Defendant Kumanomi Island Company, Ltd. makes the following disclosures:

A. Individuals with Discoverable Information

Subjects of discoverable information:

1 - Witnesses who testify to the poor job performance of Emily Barcelo.

2 - Witnesses who testify that Emily Barcelo was given warnings about her poor job performance.

3 - Witnesses who testify to the company policy against pregnancy discrimination.

4 - Witnesses who testify about company benefits such as health insurance.

5 - Witnesses who testify about the business (for example, what is sold, who are the customers, the annual sales income, etc.)

6 - Witnesses who testify why Emily Barcelo was not renewed.

	NAMES	SUBJECT	TELEPHONE	ADDRESS
1	Mayumi Nakadai*	1, 2, 3, 4, 5, 6		
2	Evelyn (Lopez) Enrico*	1, 2, 3, 4, 5		
3	Adora Pineda*	1, 2, 3, 4, 5		
4	Crisanta Blas*	1, 2, 3, 4, 5		
5	Celina Encarnacion*	1, 2, 3, 4, 5, 6		
6	Myla Soledad		unknown	unknown
7	Eden De Belen*	1, 2, 3, 4,		
8	Maricel Acuin*	1, 2, 4,		
9	Maria Celia Dayno*	1, 2, 3, 4,		
10	Editha Rivera*	1, 2, 3, 4, 5		
11	Jojit Paz		unknown	unknown
12	Tomomi Nakano*	1, 2, 3, 4, 5, 6		

13	Michelle Rodriguez*	1, 2,		
14	Milagros Matriano*	1, 2, 3, 4, 5		
15	Josephine Dionisio*	1, 2, 3, 4, 5		
16	Nancy Garcia*	1, 2, 5		
17	Vira Seman*	1, 2, 3,		
18	Janice Enrico*	1, 2,		
19	Masahiko Hagiwara*	1, 2, 3, 4, 5		
20	Gina Reyes*	1, 2, 3, 4, 5		
21	Ponciano Rivera*	1, 2, 3, 4, 5		
22	Gertrudes Valdez*	3, 5		
23	Michael Umali*	3, 4, 5		
24	Genalyn Reyes*	3, 4, 5		
25	Marifer Galang*	3, 4, 5		
26	Jenny Magtangob*	3, 4, 5		
28	Lilybeth Hermosa*	3, 4, 5		
29	Jasmin Dizon*	3, 4, 5		
30	Shirley Ignacio*	5		
31	Bruce Berline**	3, 6	(670) 233-3663	1/F Macaranas Building, Beach Road, Garapan P.O. Box 5682 CHRB Saipan, MP 96950
32	Glory Gervacio	6	(808) 541-3121	EEOC Honolulu Local Office, 300 Ala Moana Boulevard, Rm. 7- 127, Honolulu, HI 96850-0051
33	Peter [Gil?] San Nicholas	6	(670) 236-0900	2/F Afetna Square Building, San Antonio, Caller Box 10007 Saipan, MP 96950

* - If a telephone number or address is not stated, then the included names can be reached through Defendant's counsel.

** - May have properly discoverable information but because Mr. Berline was counsel to the Defendant, much of the information he has is protected by attorney-client privilege and Defendant does not waive that privilege by making this disclosure.

1 **B. Documents Supporting Defendant's Claims**

2 All documents (except as indicated below) have been previously produced. They are now
3 bates stamped 00001 through 00407 by Plaintiff.
4

5 A partial transcript of a digital recording exists and is being produced as bates number
6 00408 – 00427.
7

8 **C. Computation of Damages**

9 Charging party has \$0.00 damages. The Defendant has not made a counterclaim.
10

11 **D. Insurance Policies**

12 None that would apply here exist, except to the extent the health insurance policy is
13 relevant to the Plaintiff's claim. The health insurance policy will be made available for
14 inspection and copying upon Plaintiff's request.
15
16

17 The above disclosures are made without waiving attorney-client privilege or work
18 product protections. Defendant reserves the right to supplement these disclosures.
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21 Dated: January 17 2006.

22 Respectfully submitted,
23 O'CONNOR BERMAN DOTTS & BANES

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26 By: 
27 MICHAEL W. DOTTS (F0150)
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